

UNITED STATES DISTRICT COURT

MAR 13 2019

SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA

v.

1. RODOLFO HERNANDEZ RAMOS  
AKA "VITO" AKA "FITO"
2. LUIS ORTIZ III AKA "PANCHO"
3. FLORENTINO GALVAN AKA "TINO"
4. ANTONIO SAENZ
5. GUADALUPE GONZALEZ  
AKA "CHAPARRO"
6. EMILIO GARCIA URIBE AKA "MILO"
7. ULISES FRANCISCO CORTINAS  
AKA "CHIQUILIN"

**SEALED**

CRIMINAL NUMBER \_\_\_\_\_

**C-19-0214**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about July 1, 2014, and continuing until the date of this Indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
FLORENTINO GALVAN AKA "TINO",  
ANTONIO SAENZ,  
GUADALUPE GONZALEZ AKA "CHAPARRO",  
EMILIO GARCIA URIBE AKA "MILO",  
and ULISES FRANCISCO CORTINAS AKA "CHIQUILIN",

did knowingly and intentionally conspire and agree together, with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute controlled

substances. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and more than one thousand (1,000) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**COUNT TWO**

Between on or about July 1, 2014, and continuing until the date of this Indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
FLORENTINO GALVAN AKA "TINO",  
ANTONIO SAENZ,  
GUADALUPE GONZALEZ AKA "CHAPARRO",  
EMILIO GARCIA URIBE AKA "MILO",  
and ULISES FRANCISCO CORTINAS AKA "CHIQUELIN",

did knowingly and intentionally conspire and agree together, with each other, and with other persons known and unknown to the Grand Jury, to conduct financial transactions which in fact involved the proceeds of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute, and to transport, transmit, and transfer monetary instruments and funds, that is, United States currency, from a place in the United States to or through a place outside the United States, which the defendants then well knew represented the proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute, with the intent to promote the carrying on of specified unlawful activity, knowing that the transactions and transportation were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal Law.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (ii), 1956(a)(2)(A), 1956(a)(2)(B)(i) and (ii), and 1956(h).

**COUNTS THREE -- TEN**

On or about April 7, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",

did knowingly and intentionally conduct and attempt to conduct the financial transactions detailed below, which affected interstate and foreign commerce, then well knowing that the financial transactions involved the proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

COUNT	Date	Amount	Money Order Number	Purchase Location
THREE	April 7, 2015	\$1,000.00	22678514526	USPS #785750, Olmito, Texas
FOUR	April 7, 2015	\$500.00	C-2166032650	Stripes #2166, Brownsville, Texas
FIVE	April 7, 2015	\$500.00	C-2166032651	Stripes #2166, Brownsville, Texas
SIX	April 7, 2015	\$500.00	C-2217040488	Stripes #2217, Brownsville, Texas
SEVEN	April 7, 2015	\$500.00	C-2217040489	Stripes #2217, Brownsville, Texas
EIGHT	April 7, 2015	\$500.00	C-9108058633	Stripes #9108, Brownsville, Texas
NINE	April 7, 2015	\$500.00	C-9108058634	Stripes #9108, Brownsville, Texas
TEN	April 7, 2015	\$500.00	C-2263018975	Stripes #2263, Brownsville, Texas

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(a)(1)(B)(ii), and 2.

**COUNT ELEVEN**

On or about April 23, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

FLORENTINO GALVAN AKA "TINO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately twenty-five and ninety-nine hundredths (25.99) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT TWELVE**

On or about June 16, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved less than fifty (50) kilograms of marihuana, that is, approximately nineteen and fifty-four hundredths (19.54) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(D), and Title 18, United States Code, Section 2.

**COUNT THIRTEEN**

On or about June 17, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately eight (8) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT FOURTEEN**

On or about July 12, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$115,780.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances, from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid

a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A), 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

**COUNTS FIFTEEN – THIRTY**

Between or about July 1, 2017, and on or about August 2, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RODOLFO HERNANDEZ RAMOS AKA “VITO” AKA “FITO”,

did knowingly and intentionally conduct and attempt to conduct the financial transactions detailed below, which affected interstate and foreign commerce, then well knowing that the financial transactions involved the proceeds of some form of unlawful activity, to wit: the unlawful possession of controlled substances with intent to distribute, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

COUNT	Date	Amount	Money Order Number	Purchase Location
FIFTEEN	July 1, 2017	\$500.00	C-2118007136	Stripes #2118, Corpus Christi, Texas
SIXTEEN	July 1, 2017	\$500.00	C-2118007137	Stripes #2118, Corpus Christi, Texas
SEVENTEEN	July 6, 2017	\$500.00	C-2217049143	Stripes #2217, Brownsville, Texas
EIGHTEEN	July 6, 2017	\$500.00	C-2217049144	Stripes #2217, Brownsville, Texas
NINETEEN	July 10, 2017	\$1,000.00	24538980598	USPS #785750, Olmito, Texas
TWENTY	July 11, 2017	\$1,000.00	24538980835	USPS #785750, Olmito, Texas
TWENTY-ONE	July 25, 2017	\$500.00	C-9108079420	Stripes #9108, Brownsville, Texas
TWENTY-TWO	July 25, 2017	\$500.00	C-9108079421	Stripes #9108, Brownsville, Texas

COUNT	Date	Amount	Money Order Number	Purchase Location
TWENTY-THREE	August 2, 2017	\$500.00	C-2162048563	Stripes #2162, Brownsville, Texas
TWENTY-FOUR	August 2, 2017	\$500.00	C-2162048564	Stripes #2162, Brownsville, Texas
TWENTY-FIVE	August 2, 2017	\$500.00	C-2162048565	Stripes #2162, Brownsville, Texas
TWENTY-SIX	August 2, 2017	\$500.00	C-2188028199	Stripes #2188, Brownsville, Texas
TWENTY-SEVEN	August 2, 2017	\$500.00	C-2188028200	Stripes #2188, Brownsville, Texas
TWENTY-EIGHT	August 2, 2017	\$500.00	C-2188028201	Stripes #2188, Brownsville, Texas
TWENTY-NINE	August 2, 2017	\$1,000.00	24538985010	USPS #785750, Olmito, Texas
THIRTY	August 2, 2017	\$1,000.00	24538985021	USPS #785750, Olmito, Texas

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(a)(1)(B)(ii), and 2.

### **COUNT THIRTY-ONE**

Between on or about October 17, 2017, and on or about October 19, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
 LUIS ORTIZ III AKA "PANCHO",  
 FLORENTINO GALVAN AKA "TINO",  
 and EMILIO GARCIA URIBE AKA "MILO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved more than 100 kilograms of marihuana, that is, approximately two hundred seventy-two and twenty-six hundredths (272.26) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.



**COUNT THIRTY-TWO**

On or about December 16, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved less than fifty (50) kilograms of marihuana, that is, approximately nineteen and seventy-two hundredths (19.72) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(D), and Title 18, United States Code, Section 2.

**COUNT THIRTY-THREE**

On or about December 19, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
and ULISES FRANCISCO CORTINAS AKA "CHIQUILIN",

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$36,980.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances, from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation,



transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A), 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

**COUNT THIRTY-FOUR**

On or about May 7, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$203,950.00 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances, from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A), 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

**COUNT THIRTY-FIVE**

Between on or about May 12, 2018, and on or about May 17, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
and ANTONIO SAENZ,

did knowingly and intentionally transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, \$90,718.02 in United States currency, which involved the proceeds of specified unlawful activity, to wit: possession with intent to distribute controlled substances, from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A), 1956(a)(2)(B)(i), 1956(a)(2)(B)(ii), and 2.

**COUNT THIRTY-SIX**

On or about May 18, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved less than fifty (50) kilograms of marihuana, that is, approximately fifteen and eighteen-hundredths (15.18) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(D), and Title 18, United States Code, Section 2.

**COUNT THIRTY-SEVEN**

On or about May 21, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately nine hundred eighty (980) grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT THIRTY-EIGHT**

On or about May 22, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately one and three-tenths (1.3) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT THIRTY-NINE**

On or about May 22, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately three (3.0) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FORTY**

On or about May 22, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",

and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two and ninety-six hundredths (2.96) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FORTY-ONE**

On or about May 22, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
and LUIS ORTIZ III AKA "PANCHO",

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately two and ninety-eight hundredths (2.98) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) , 841(b)(1)(B), and Title 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE  
(21 U.S.C. § 853(a))

Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to the defendants:

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
FLORENTINO GALVAN AKA "TINO",  
ANTONIO SAENZ,  
GUADALUPE GONZALEZ AKA "CHAPARRO",  
EMILIO GARCIA URIBE AKA "MILO",  
and ULISES FRANCISCO CORTINAS AKA "CHIQUILIN",

that upon conviction of conspiracy as charged in Count ONE of the Indictment, or of a violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts ELEVEN THRU THIRTEEN, THIRTY-ONE, THIRTY-TWO, and THIRTY-SIX THRU FORTY-ONE of the Indictment, the following property, whether real or personal, is subject to forfeiture:

- 1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such conspiracy; and
- 2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such conspiracy.
- 3)

NOTICE OF CRIMINAL FORFEITURE  
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

RODOLFO HERNANDEZ RAMOS AKA "VITO" AKA "FITO",  
LUIS ORTIZ III AKA "PANCHO",  
FLORENTINO GALVAN AKA "TINO",  
ANTONIO SAENZ,  
GUADALUPE GONZALEZ AKA "CHAPARRO",  
EMILIO GARCIA URIBE AKA "MILO",  
and ULISES FRANCISCO CORTINA AKA "CHIQUILIN",

that, upon conviction of a conspiracy in violation of Title 18, United States Code, Section 1956(h) as charged in Count TWO of the Indictment, or of a violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) or 1956(a)(1)(B)(ii), or 1956(a)(2)(B)(i) or 1956(a)(2)(B)(ii), as charged in Counts THREE THRU TEN, FOURTEEN THRU THIRTY, and THIRTY-THREE THRU THIRTY-FIVE of the Indictment, all property, real or personal, involved in such money laundering offenses or traceable to such property, is subject to forfeiture to the United States.

PROPERTY SUBJECT TO FORFEITURE

The property to be forfeited includes, but is not limited to, the following:

- a. approximately \$10 million in United States currency, which includes but is not limited to the following United States currency seizures by the government:
  1. \$115,780.00 seized on or about July 12, 2017;
  2. \$36,980.00 seized on or about December 19, 2017;
  3. \$203,950.00 seized on or about May 7, 2018;
  4. \$90,718.02 seized on or about May 17, 2018; and,
- b. the following real property, with improvements and appurtenances:
  1. located at 808 Morelos Avenue, Rancho Viejo, Texas, and legally described as:

LOT ELEVEN (11), RANCHO VIEJO SUBDIVISION SECTION IX, TOWN OF RANCHO VIEJO, CAMERON COUNTY, TEXAS, ACCORDING TO MAP THEREOF RECORDED IN VOLUME 26, PAGES 33 THRU 43, DEED RECORDS, CAMERON COUNTY, TEXAS.




MONEY JUDGMENT/SUBSTITUTE ASSETS

Defendants are notified that upon conviction, a money judgment may be imposed equal to the value of the property subject to forfeiture, for which the defendants may be jointly and severally liable. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
KENNETH A. CUSICK  
Assistant United States Attorney